

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE: ) NO: 22-42919-399  
 ) CHAPTER 13  
William Martin, ) Hearing Date: 11/16/2022  
 ) Hearing Time: 10:00 a.m.  
Debtor. ) Courtroom: 5 North

TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

Comes now Diana S. Daugherty, Standing Chapter 13 Trustee,  
and states as follows:

1. Schedule D omits the secured debt to the St. Louis County Collector that is listed in plan paragraph 3.5(C).
2. The plan is not feasible in that:
  - a) It will not fully pay the \$12,098 guarantee to non-priority unsecured creditors.
  - b) Based on presently filed claims and scheduled debts, the base of the plan is approximately \$3,470 short of being feasible.

**WHEREFORE,** the Trustee prays that the Court deny confirmation of Debtor's Chapter 13 Plan; and for such other relief as this Honorable Court deems necessary and just under the circumstances.

Respectfully Submitted,

/s/ Joseph M. Wilson  
Diana S. Daugherty  
Chapter 13 Trustee  
Joseph M. Wilson  
FED#51849MO; MO#51849

Attorney For Trustee  
P.O. Box 430908  
St. Louis, MO 63143  
(314) 781-8100  
(314) 781-8881 (fax)  
E-Mail: trust33@ch13stl.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above Trustee's Objection was filed electronically with the United States Bankruptcy Court on the 13th day of October, 2022, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

The undersigned hereby certifies that the above Trustee's Objection was filed electronically with the United States Bankruptcy Court and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below, on the 13th day of October, 2022:

William Martin  
2349 Addie Ave.  
St. Louis, MO 63114-5534

/s/ Joseph M. Wilson